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*Attorneys for Defendant Henkel US Operations,
9 sued improperly here as Henkel Corporation as
successor-in-interest to Loctite Corporation and
10 Dexter Hysol*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA, SOUTHERN DIVISION

13 JORDAN J. POTTER,

14 Plaintiff,

15 vs.

16 ARROWHEAD PRODUCTS, individually
and as successor in interest to Arrowhead
17 Rubber Company; CRANE CO.; DCO, LLC;
EATON AEROQUIP, LLC; GENERAL
18 DYNAMICS CORPORATION; GENERAL
ELECTRIC COMPANY; GOODRICH
19 CORPORATION f/k/a The BF Goodrich
Company; HARCOSEMCO LLC f/k/a Harco
20 LLC; HENKEL CORPORATION as
successor-in-interest to Loctite Corporation and
21 Dexter Hysol; HEXCEL CORPORATION,
f/k/a Health Tecna f/k/a Ciba-Geigy;
22 HONEYWELL INTERNATIONAL, INC.,
Individually and as successor to Alliedsignal,
23 Inc. and the Bendix Corporation; IMO
INDUSTRIES, INC.; IMO INDUSTRIES,
24 INC., Individually and as successor in interest
to Adel Fasteners; NORTHROP GRUMMAN
25 CORPORATION; OLD ORCHARD
INDUSTRIAL CORP.; PARKER-HANNIFIN
26 CORPORATION, as successor-in-interest to
Cleveland Wheel & Brake and Stratoflex
27 Products; ROGERS CORPORATION;
TELEFLEX INCORPORATED; TIGHTCO
28 INC, as successor-in-interest to H.I. Thompson

CASE NO. 2:20-CV-00276-RFB-VCF

**PLAINTIFF JORDAN J. POTTER AND
DEFENDANT HENKEL US
OPERATION'S STIPULATION FOR
EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(First Request)

1 Company and HITCO; TITEFLEX
2 COMMERCIAL INC; RAYTHEON
3 TECHNOLOGIES CORPORATION f/k/a
4 United Technologies Corporation; WYETH
5 HOLDINGS LLC f/k/a Wyeth Holdings Corp.
6 f/k/a American Cyanamid Corporation; DOES
7 1 through 10, inclusive; and ROE
8 CORPORATIONS 1 through 50, inclusive,
9
10 Defendants.

11 Plaintiff JORDAN J. POTTER (“Plaintiff”), by and through his counsel of record, the law
12 firms of Maune Raichle Hartley French & Mudd, LLC and Craig P. Kenney & Associates, and
13 Defendant Henkel US OPERATIONS, sued improperly here as HENKEL CORPORATION as
14 successor-in-interest to LOCITE Corporation and DEXTER HYSOL (“Defendant”), by and
15 though its counsel of record, the law firm of Lewis Brisbois Bisgaard & Smith, LLP, hereby
16 stipulate and agree as follows:

17 WHEREAS Plaintiff filed his First Amended Complaint in this Action on August 26,
18 2020;

19 WHEREAS Defendant was identified as a party to the action by way of the Plaintiff’s First
20 Amended Complaint;

21 WHEREAS Defendant was served via its registered agent in Connecticut on September 11,
22 2020;

23 WHEREAS Defendant’s responsive pleading is due October 2, 2020;

24 WHEREAS counsel for the parties met and conferred via telephone and electronic means
25 to discuss the matter, and it was agreed that Defendant would have up to and including October
26 14, 2020, with which to prepare and file its responsive pleading as its counsel needs additional
27 time to confer with Defendant;

28 WHEREAS good cause exists to extend the deadline for Defendant to respond to
Plaintiff’s First Amended Complaint;

WHEREAS the parties are engaged in genuine and ongoing discussions;

WHEREAS other defendants initially named and identified as parties in Plaintiff’s First
Amended Complaint have been afforded and granted extensions of time with which to file their

1 responsive pleadings pursuant to USDC-NV Local Rule IA 6-1;

2 WHEREAS there is currently pending before this Honorable Court a joint motion for
3 extension of all remaining deadlines in this matter pursuant to USDC-NV Local Rule IA 6-1, with
4 said motion scheduled for Hearing on October 19, 2020;

5 IT IS HEREBY STIPULATED AND AGREED between Plaintiff and Defendant shall be
6 provided until October 14, 2020, with which to file its responsive pleading, as otherwise required.

7
8 IT IS SO STIPULATED

9 Dated October 2, 2020.

Dated October 2, 2020.

10 CRAIG P. KENNY & ASSOCIATES

MAUNE RAICHLE HARTLEY FRENCH &
MUDD, LLC

11 By: /s/ Lawrence E. Mitten

By: /s/ Benjamin W. Haile

12 Lawrence E. Mitten

T. Barton French

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(Admitted Pro Hac Vice)

16 *Attorneys for Plaintiff Jordan J. Potter*

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17 *Attorneys for Plaintiff Jordan J. Potter*

18
19 Dated October 2, 2020.

20 LEWIS BRISBOIS BISGAARD & SMITH, LLP

IT IS SO ORDERED.

21 By: /s/ Steven B. Abbott

22 Steven B. Abbott

23 Nevada Bar No. 10303

Michael R. Smith

24 Nevada Bar No. 12641

6385 South Rainbow Blvd., Suite 600

25 Las Vegas, Nevada 89118

26 *Attorneys for Defendant Henkel US Operations,*

27 *sued improperly here as Henkel Corporation*

28 *as successor-in-interest to Loctite Corporation &*

Dexter Hysol


Cam Ferenbach

United States Magistrate Judge

10-2-2020

Dated: _____